

## **OBSERVATION REPORT #44**

**KPMG Consulting has identified discrepancies in the “completion date” field used by Verizon-New Jersey (VZN-NJ) to calculate Network Performance Metrics NP-2-02 through NP-2-08.**

### **Issue**

The Metrics NP-2-02 through NP-2-08 measure VZN-NJ’s performance on the completion of Physical and Virtual Collocation requests by CLECs. These metrics measure Average Interval, % On Time Response and Average Delay Days for both types of collocation, and rely on the “completion date” of a collocation request or application. The completion date of a collocation application determines the month in which that record is counted for metrics reporting purposes.

The Carrier-to-Carrier Guidelines are not explicit on whether the completion date is defined as the date that VZN-NJ completes the work on the collocated space or the date that the CLEC actually accepts the collocated space as being “completed.” KPMG Consulting’s interpretation is that the date the CLEC takes ownership should dictate the “completion date” for the collocated space. However, during discussions with VZN-NJ, KPMG Consulting found that VZN-NJ may update the completion date field *after* the Carrier-to-Carrier (C2C) Reports have been published. For instance, even though VZN-NJ has already reported the space as “complete,” a CLEC may not accept the collocated space. Thus, the collocation request is not actually complete, and the space may require additional work by VZN-NJ before the CLEC accepts it. Once the space has been accepted by the CLEC, VZN-NJ may revise the “completion date” field to reflect the actual completion date.

When VZN-NJ updates the “completion date” with a later month after the current month C2C reports have been published, collocation records may be double-counted. This double-counting may occur as the current C2C Report will contain the collocation request with the old completion date and the next month’s C2C report will also contain the same collocation request with the updated completion date. In addition, when VZN-NJ changes the completion date field after C2C Reports have been published, metric results for NP-2-02 through NP-2-08 also may be inaccurate.

### **Assessment**

Metrics NP 2-02 through NP 2-08 may be inaccurately reported due to a potential double counting of records creating a situation where CLECs are unable to adequately determine whether they are receiving the service levels mandated in the New Jersey Carrier-to-Carrier Guidelines (May 2000).